

1 JaVonne M. Phillips, Esq. SBN 187474  
2 **McCarthy & Holthus, LLP**  
3 2763 Camino Del Rio South, Suite 100  
4 San Diego, CA 92108  
5 Phone (877) 369-6122  
6 Fax (619) 685-4811  
7 bknotice@mccarthyholthus.com

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9 Attorneys for PNC Bank, National Association

10 UNITED STATES BANKRUPTCY COURT  
11 CENTRAL DISTRICT OF CALIFORNIA  
12 LOS ANGELES DIVISION

13 In re ) Case No. 2:23-bk-12707-VZ  
14 )  
15 Fred Tucker, ) Chapter 13  
16 )  
17 Debtor. ) **DECLARATION IN SUPPORT OF**  
18 ) **OBJECTION**  
19 ) **Confirmation Hearing:**  
20 ) Date: 7/22/2024  
21 ) Time: 10:00 AM  
22 ) Place: 13th Floor, 1368  
23 ) 255 E. Temple Street  
24 ) Los Angeles CA  
25 )  
26 )  
27 )

28  
29 **DECLARATION IN SUPPORT OF OBJECTION**

1 I, Mark Feliciano, declare and state as follows:

2 1. I am over 18 years of age and am employed as a Default Litigation Specialist, Sr. of PNC  
3 Bank, National Association ("PNC Bank, N.A."). In such capacity, I am authorized to make this  
4 declaration regarding the loan described below (the "Loan"). If called to testify in this matter, I  
5 would testify under oath as to the following:

6 2. I have access to and am familiar with the books and records of PNC Bank, N.A.  
7 regarding the Loan, including the servicing records and copies of the applicable Loan documents  
8 of PNC Bank, N.A.. I am familiar with the manner in which PNC Bank, N.A. maintains its  
9 books and records, including computer records relating to the servicing of the Loan. The records  
10 of PNC Bank, N.A. are made at or near the time of the occurrence of the matters set forth in such  
11 records, by an employee or representative with knowledge of the acts or events recorded. Such  
12 records are obtained, kept and maintained by PNC Bank, N.A. in the regular course of business  
13 of PNC Bank, N.A.. PNC Bank, N.A. relies on such records in the ordinary course of its  
14 business.

15 3. I am familiar with the manner and procedure by which the records of PNC Bank,  
16 N.A., are obtained, prepared, and maintained. Those records are obtained, prepared, and  
17 maintained by employees or agents at PNC Bank, N.A. in the performance of their regular  
18 business duties at or near the time, act, conditions, or events recorded thereon. The records are  
19 made either by persons with knowledge of the matters they record or from information obtained  
20 by persons with such knowledge. It is my business practice to maintain these records in the  
21 regular course of business.

22 4. The subject real property securing the Deed of Trust loan is commonly known as  
23 1232 Via Landeta, Palos Verdes Estate, CA 90274, and legally described as set forth in the  
24 attached Deed of Trust.

25 5. PNC Bank, N.A. is the holder of a Promissory Note dated 1/21/1988, in the  
26 principal amount of \$375,000.00, which is secured by the Deed of Trust of the same date, and  
27 recorded in the Official Records of Los Angeles County, on 2/5/1988. True and correct copies of  
28 the Deed of Trust and Note are attached hereto as Exhibits "2" and "3" respectively.  
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